

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

KRISTEN NOVEY  
15500 Platte Street  
Apartment 313A  
Denver, CO 80202

Plaintiff

v.

Civil Action No. \_\_\_\_\_

VALLEY PROTEINS, INC.  
Route 2, Box 156  
Winchester, VA 22601  
[serve Registered Agent]  
CSC-Lawyers Incorporating  
Service Company  
7 St. Paul Street, Suite 1660  
Baltimore, MD 21202

and

BASILIO THRASHER  
1 Middleview Court  
Windsor Mill, MD 21244

Defendants

11 06 30 AM 9:36  
Clerk of the  
Circuit Court

**COMPLAINT**

COMES NOW the Plaintiff, Kristen Novey, by her attorney, Kenneth J. Annis, Esquire, and sues the Defendants, Valley Proteins, Inc. and Basilio Thrasher, and in support thereof states:

1. Plaintiff Kristen Novey is a resident of Denver, Colorado.
2. Defendant Valley Proteins, Inc. is a Virginia Corporation licensed and authorized to do business in the State of Maryland and is subject to service of process from this Court.

3. Defendant Basilio Thrasher is a resident of Windsor Mill, Maryland and is subject to service of process from this Court.

4. The accident giving rise to this suit occurred in Prince George's County, Maryland.

5. On or about April 29, 2008, at approximately 2:37 p.m., Plaintiff, Kristen Novey was lawfully and carefully operating a motor vehicle northbound on Livingston Road, at the intersection with Indian Head Highway, in Ft. Washington, Maryland.

6. Plaintiff was passing through the intersection with a green light.

7. On the same date at the same time, Defendant Basilio Thrasher, an employee of Defendant Valley Proteins, Inc., was operating a 97 Ford Diesel truck owned by Defendant Valley Proteins, Inc. in the course of his employment with Valley Proteins, Inc., with full knowledge and consent of Defendant Valley Proteins, Inc.

8. At that time and place, Defendant Basilio Thrasher was traveling eastbound on Indian Head Highway, at the intersection with Livingston Road., in Ft. Washington, Maryland.

9. At that time and place, Defendant Basilio Thrasher passed through the aforementioned intersection against a red light and collided with the Plaintiff's vehicle.

10. Defendant Basilio Thrasher operated his vehicle in a negligent and careless manner by failing to yield the right

way, failing to obey an official traffic signal, failing to stop at the red light, failing to pay full time and attention, failing to control the speed and direction of his vehicle as to avoid a collision, failing to keep a proper lookout, traveling at an unreasonable and excessive rate of speed, and failing to maintain proper control of his vehicle when entering the intersection, and passed through the intersection without stopping, thereby causing his vehicle to violently collide with Plaintiff's vehicle.

11. Defendant Basilio Thrasher had a duty of care to operate his vehicle in a proper fashion, and breached this duty of care by failing to operate his vehicle in a safe and proper manner.

12. Despite the aforesaid duty and in breach thereof, Defendant Basilio Thrasher so carelessly and negligently operated his vehicle, in particular that he failed to yield the right of way at the intersection, failed to pay full time and attention, failed to obey an official traffic signal, failed to stop at the red light, failed to control the speed and direction of his vehicle as to avoid a collision, failed to keep a proper lookout, traveled at an unreasonable and excessive rate of speed, failed to see, or having seen, failed to avoid colliding with Plaintiff's vehicle, and failed to keep his automobile under proper control, that Defendant Basilio Thrasher caused the vehicle he was operating to violently collide with Plaintiff's automobile at the aforementioned intersection.

13. Defendant Basilio Thrasher's negligence proximately caused Plaintiff Kristen Novey to suffer serious and permanent injuries about her neck, back, left wrist and left knee, specifically a patellofemoral compression injury to the left knee which required surgical repair, a ligament tear in her left wrist which required surgical repair and extensive rehabilitative and physical therapy, and other injuries, damages and losses all of which are continuing and permanent. Plaintiff has also sustained permanent surgical scars on and about her body. Plaintiff was further caused to suffer great mental anguish, loss of work and lost income.

14. As a further direct and proximate result of the Defendant's negligence as aforesaid Plaintiff was caused to undergo physical therapy, multiple x-rays and MRIs, two (2) surgical procedures and other medical care and treatment and has incurred expenses for said medical treatment and may be required to undergo medical treatment in the future, and may incur related expenses and additional lost earnings; as a further direct and proximate result of the Defendant's negligence as aforesaid Plaintiff was unable to engage in her normal and usual activities.

15. All such injuries suffered by Plaintiff Kristen Novey were caused solely by the negligence of Defendant Basilio Thrasher, which is imputed to Defendant Valley Proteins, Inc., without any negligence by Plaintiff Kristen Novey.

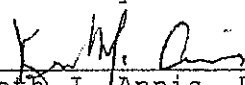
16. Defendant Basilio Thrasher was operating a motor vehicle with the knowledge and consent of Defendant Valley

Proteins, Inc. at the time of this occurrence; Defendant Basilio Thrasher was operating a motor vehicle owned by Defendant Valley Proteins, Inc. in the course of his employment with Defendant Valley Proteins, Inc.; Defendant Valley Proteins, Inc. is liable for Defendant Basilio Thrasher's negligence in causing injury to Plaintiff Kristen Novey.

17. At all times pertinent hereto, Plaintiff acted reasonably, carefully and prudently and in no way caused or contributed to the incident herein set forth or to her injuries, damages, and/or losses.

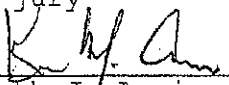
WHEREFORE, Plaintiff, Kristen Novey, claims judgment against the Defendants, Valley Proteins, Inc. and Basilio Thrasher, jointly and severally, in the sum of TWO MILLION DOLLARS (\$2,000,000.00), plus interest and costs.

Respectfully Submitted,

  
Kenneth J. Annis, Esquire  
1100 Connecticut Avenue, NW #545  
Washington, D.C. 20036  
(202) 785-2244  
Attorney for Plaintiff

JURY DEMAND

Plaintiff hereby requests trial by jury.

  
Kenneth J. Annis, Esquire

CERTIFICATION

I HEREBY CERTIFY that I am a member in good standing of the Maryland Bar.

  
Kenneth J. Annis, Esquire